

**O'NEILL / HASSEN**

Attorneys at Law

April 1, 2021

VIA ECF

Honorable Denise L. Cote  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

RE: *United States v. Sean Jones*, 18 Cr. 41 (DLC)

Dear Judge Cote:

I was appointed to represent Sean Jones in the above-captioned case. I have been in communication with Mr. Jones, but we need more time to determine whether we will be filing a compassionate release motion. As the Court is undoubtedly aware communication in prison has been delayed due to the COVID-19 pandemic. I respectfully request an adjournment of the deadlines for 90 days. This will allow me to continue to consult with Mr. Jones and to determine what if any motions are appropriate. The government consents to this request.

The new deadlines proposed deadlines are as follows:


Defense submission: July 1, 2021  
Government response: July 15, 2021  
Defense reply: July 22, 2021

I thank the Court for its consideration of this request.  
Granted. The proposed schedule governs.  
Dated: April 1, 2021

Kind regards,

/s/

Grainne E. O'Neill

  
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DENISE COTE  
United States District Judge